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16 Attorneys for Defendant
17 DISH Network Corporation, et al.

18 IN THE UNITED STATES DISTRICT COURT
19 CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

20 ENTROPIC COMMUNICATIONS,
21 LLC,

22 Plaintiff,

23 v.

24 DISH NETWORK CORPORATION;
25 DISH NETWORK L.L.C.; DISH
26 NETWORK SERVICE, L.L.C.; AND
27 DISH NETWORK CALIFORNIA
SERVICE CORPORATION,

28 Defendants.

Case No. 2:23-cv-1043-JWH-KES

**DECLARATION OF OLIVER J.
RICHARDS IN SUPPORT OF
DEFENDANT DISH NETWORK
CORPORATION, ET AL.'S EX
PARTE MOTION TO EXTEND
TIME TO AMEND AND/OR
RESPOND TO MOTION**

District Judge: Hon. John W. Holcomb
Magistrate Judge: Hon. Karen E. Scott

1 DISH NETWORK CALIFORNIA
2 SERVICE CORPORATION,

3 Counter-Claimant,

4 v.

5 ENTROPIC COMMUNICATIONS,
6 LLC; MAXLINEAR, INC.; AND
7 MAXLINEAR COMMUNICATIONS
8 LLC,

9 Counter-Defendants.
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1 I, Oliver J. Richards, hereby declare and state as follows:

2 1. I am a principal in the law firm of Fish & Richardson P.C., counsel of
3 record for Defendants DISH Network Corporation, DISH Network L.L.C., DISH
4 Network Service, L.L.C., and Dish Network California Service Corporation
5 (collectively, “Defendants” and “DISH”) in the above-captioned matter. I have
6 personal knowledge of all the facts contained herein and, if called as a witness, I could
7 and would testify competently thereto.

8 2. Attached as Exhibit A is a true and correct copy of an email I sent to
9 counsel for MaxLinear on Tuesday, December 19, 2023, in response to a letter sent
10 by MaxLinear on December 19, 2023..

11 3. Attached as Exhibit B is a true and correct copy of an email I received
12 from counsel for MaxLinear on December 21, 2023.

13 4. Attached as Exhibit C is a true and correct copy of correspondence sent
14 by my colleague David Barken to counsel for MaxLinear on Thursday, December 22,
15 2023.

16 5. Attached as Exhibit D is a true and correct copy of an email I sent to
17 counsel for MaxLinear on Tuesday, December 26, 2023.

18 6. I, along with my colleague David Barkan, met and conferred with Rose
19 Lee, counsel for MaxLinear, on Thursday, December 28, 2023 via telephone. The
20 parties were unable to reach agreement as to a schedule for Dish California to amend
21 its counterclaims and/or respond to MaxLinear’s motion to dismiss. Counsel for
22 MaxLinear indicated that its team was on vacation between Christmas and New
23 Years, and noted inconvenience in having to respond to an ex parte application before
24 the new year.

25 7. Attached as Exhibit E is a true and correct copy of email correspondence
26 between counsel for MaxLinear and counsel for Dish California.

27 8. Prior to stipulating to extending the time for it to respond to Dish
28 California’s counterclaims, on a meet and confer I attended with counsel for Entropic,

1 Entropic indicated on a meet and confer that it intended to challenge the sufficiency
2 of the counterclaims on similar bases to those raised in MaxLinear's motion. Namely,
3 Entropic indicated it intended to challenge the sufficiency of Dish California's civil
4 conspiracy allegations and that voiding the assignment from MaxLinear to Entropic
5 is not a valid form of relief.

6
7
8 I declare under the penalty of perjury of the laws of the United States of
9 America that the foregoing is true and correct. Executed on January 3, 2023 in
10 Hillsboro, Oregon.

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12 By: /s/ Oliver J. Richards
13 Oliver J. Richards
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